

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRIAN BLOOM,

Plaintiff,

08-CV-02504 (JES)(THK)

-against-

RULE 7.1(a) DISCLOSURE

LONG ISLAND RAIL ROAD COMPANY,

Defendant.

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrate judges of the court to evaluate possible disqualification or recusal, the undersigned counsel of record for Defendant states that Defendant is a New York State public benefit corporation organized under the laws of the State of New York. Defendant is a subsidiary of the Metropolitan Transportation Authority ("MTA"). Other subsidiaries of the MTA are MTA Metro-North Commuter Railroad, MTA New York City Transit, MTA Long Island Bus, and MTA Bridges and Tunnels.

Dated: Jamaica, New York
April 11, 2008



Karla R. Alston (KA6778)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRIAN BLOOM,

Plaintiff,

08-CV-02504 (JES)(THK)

-against-

ANSWER

LONG ISLAND RAIL ROAD COMPANY,

Defendant.

----- x

S I R S :

Defendant, The Long Island Rail Road Company ("LIRR"), s/h/a LONG ISLAND RAILROAD COMPANY, by its attorney, MARK D. HOFFER, ESQ., answering the verified complaint of plaintiff, alleges, upon information and belief, as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in paragraph "1" but refers all questions of law to the Court for its determination.

2. Denies the allegations contained in paragraph "5" but admits that on or about January 2, 2007 plaintiff was employed by defendant.

3. Denies the allegations contained in paragraphs "7", "8", "9" and "10" of the plaintiff's complaint.

AS AND FOR AN AFFIRMATIVE DEFENSE

4. Whatever injuries and/or damages plaintiff may have sustained at the time and place alleged in the Complaint, were cause in whole or in part or were contributed to by the culpable conduct and negligence or fault or want of care on the part of the plaintiff, including contributory negligence and without any negligence or fault or want of care on the part of this

answering defendant, LIRR.

WHEREFORE, defendant demands judgment of the Court dismissing the complaint in its entirety, plus the costs and disbursements of this action.

Dated: Jamaica, NY
April 11, 2008

Yours, etc.,

MARK D. HOFFER

Vice President/General Counsel & Secretary
Attorney for Defendant

By: Karla R. Alston

Karla R. Alston (KA6778)

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File No.: TPA-0156/MTACF000932

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